

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS

MARQUITTA MCAFEE,)	
)	
<i>individually and on behalf of</i>)	
<i>all others similarly situated</i>)	
)	
Plaintiffs,)	
)	
v.)	No. 3:14-cv-01010-NJR-PMF
)	
MARION HUBBARD,)	
)	
and)	
)	
EAST ST. LOUIS PARK)	
DISTRICT)	
)	
Defendants.)	

JOINT MOTION FOR ADDITION OF NEW PLAINTIFF

Plaintiffs and Defendants, by their respective counsel, jointly petition this Court for approval of an additional plaintiff Kim Haywood to the FLSA Settlement Class. In support hereof, the parties state the following:

1. Plaintiffs and Defendants filed their joint motion requesting this Court to grant 1) Certification of a Collective Class for Settlement Purposes, 2) Preliminary Approval of Collective Action Settlement and 3) Approval of Notice to Class Members on September 23, 2016. (Doc. No. 58.)

2. This Court heard the matter on November 3, 2016 and granted preliminary approval of the proposed Settlement Agreement and conditionally certified the proposed FLSA Settlement Class.

3. Following preliminary approval, Notice was mailed to the FLSA Settlement Class. Pursuant to the Notice, potential class members had until February 17, 2017 to opt-in to the FLSA Settlement Class.

4. As of the February 17, 2017 deadline, seven (8) FLSA Settlement Class Members joined the four (4) named Plaintiffs in this litigation for the purposes of participating in the Settlement.

5. On February 21, 2017, this Court held a Final Approval of Settlement Hearing in which both parties presented arguments on the similarly situated status of the Opt-In Plaintiffs, the particulars of the proposed Settlement Agreement, and the fairness standards required for FLSA class settlements.

6. On February 24, 2017, Plaintiff's counsel received a signed opt-in consent form from potential plaintiff Kim Haywood via U.S. mail. Mr. Haywood's consent form is attached hereto as Exhibit A and is incorporated herein by reference.

7. While the deadline Mr. Haywood's consent form was received after the February 17, 2017 deadline, counsel for both parties request this Court to be considered part of the FLSA Settlement Class.

WHEREFORE, the parties jointly petition this Court for approval of adding an additional plaintiff, Kim Haywood, to the FLSA Settlement Class for such other and further relief as this Court deems just and proper.

Respectfully submitted,

Law Offices of Thomas E. Kennedy, III, L.C.

/s/ Sarah Jane Hunt

Thomas E. Kennedy, III #44617
Sarah Jane Hunt #63899
906 Olive St., Ste. 200
St. Louis, MO 63101
314.872.9041 phone
314.872.9043 fax
tkennedy@tkennedylaw.com
sarahjane@tkennedylaw.com
ATTORNEYS FOR PLAINTIFF

/s/ Kevin Kaufhold

Kevin C. Kaufhold, Esq.
Kaufhold & Associates, P.C.
5111 West Main Street, Lower Level
P.O. Box 23409
Belleville, IL 62226
kevin@kaufholdpc.com
ATTORNEY FOR DEFENDANTS

